

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibits A - B and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000

Attorney for Defendant C.R. Bard, Inc.

/s/ Clayton A. Clark
Clayton A. Clark
CLARK, LOVE & HUTSON
440 Louisiana Street
Suite 1600
Houston, TX 77002
713.757.1400 (phone)
713.759.1217

Attorney for Plaintiff on Exhibit A

/s/ A. Craig Eiland
A. Craig Eiland
THE LAW OFFICES OF A. CRAIG EILAND, PC.
2211 The Strand, Suite 201
Galveston, Texas 77550
Ph: 409-763-3260
Fax: 409-763-8154

Attorney for Plaintiff on Exhibit B

Dated: January 9, 2017

EXHIBIT A – CLARK, LOVE & HUTSON, GP

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:14-cv-08067 | Mary A Mandlak v. C.R. Bard, Inc., et al. |

EXHIBIT B – THE LAW OFFICES OF A. CRAIG EILAND, PC.

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|---|--|
| 2:14-cv-03299 | Joyce Brletic v. C.R. Bard, Inc., et al. |

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.